

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

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In re:

PROMESA

Title III

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

No. 17 BK 3283-LTS

THE COMMONWEALTH OF PUERTO RICO, *et al.*, (Jointly Administered)

Debtors.¹

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**INFORMATIVE
MOTION OF FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD REGARDING OCTOBER 6–7, 2021 OMNIBUS HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

Pursuant to the Court’s *Order Regarding Procedures for October 6–7, 2021, Omnibus Hearing* [Case No. 17-3283, ECF No. 18269], the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as sole Title III representative of the Debtors pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² respectfully states as follows:

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² PROMESA has been codified at 48 U.S.C. §§ 2101–2241.

1. The following parties will appear on behalf of the Oversight Board: (i) Martin J. Bienenstock, mbienenstock@proskauer.com; (ii) Brian S. Rosen, brosen@proskauer.com; and (iii) Daniel S. Desatnik, ddesatnik@proskauer.com of Proskauer Rose LLP.

2. Martin J. Bienenstock and Brian S. Rosen of Proskauer Rose LLP will appear to address questions and comments, if any, related to the Oversight Board's status report

3. Daniel S. Desatnik of Proskauer Rose LLP will appear and seek to be heard on PREPA's Notices of Assumption of Power Purchase Operating Agreements [Case No. 17-4780, ECF Nos. 2577, 2578].

4. Martin J. Bienenstock of Proskauer Rose LLP will appear and seek to be heard on Debtors' Motion *in Limine* in Respect of Evidence Concerning Whether the Proposed Plan of Adjustment Is Consistent with the Certified Fiscal Plan [Case No. 17-3283, ECF No. 18116].

5. Martin J. Bienenstock, Brian S. Rosen, and Daniel S. Desatnik reserve the right to be heard on any matter presented to the Court and to respond to any statements made by any party in connection with the above-captioned Title III cases to the extent it impacts the interests of the Oversight Board or any of the Debtors in these Title III cases.

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WHEREFORE, the parties respectfully request that the Court take notice of the foregoing.

Dated: October 1, 2021
San Juan, Puerto Rico

Respectfully submitted,

/s/ Martin J. Bienenstock
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EXHIBIT A

PARTY APPEARANCE COVER SHEET